| UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS |                                  |
|--|----------------------------------|
|  |                                  |
| JAY SRINIVASAN, Plaintiff                              |                                  |
| v.   | ) Civil Action No.: 05-10900-GAO |
| SIEMENS BUSINESS SERVICES, INC.,                       | )                                |
| Defendant  | )<br>                            |
|  | <del></del>                      |

## MOTION FOR ADMISSION PRO HAC VICE

Michael G. Tracy, a partner in the law firm of Rudolph Friedmann LLP and a member in good standing of the bar of this court, hereby moves, pursuant to Local Rule 83.5.3, that the court grant leave to Jean L. Schmidt to appear and practice before this court, *pro hac vice*, in this action on behalf of the defendant, Siemens Business Services, Inc. ("Siemens"). In support of this motion, the undersigned submits as follows:

- 1. Ms. Schmidt is a partner in the law firm of Brown Raysman Millstein Felder & Steiner LLP, New York, New York, and is a member in good standing of the bar of the State of New York, the bar of the United States District Court for the Southern District of New York, and of the bars of all other federal and state courts to which she has been admitted.
- 2. Siemens has a long-standing attorney-client relationship with Ms. Schmidt and her firm, particularly in employment law matters.

- 3. Ms. Schmidt represented Siemens in the pre-suit aspects of this matter before the Massachusetts Commission against Discrimination and the United States Equal Employment Opportunity Commission. As a result, she is familiar with the factual and legal issues involved in this case.
- 4. Ms. Schmidt has executed a certificate in compliance with Local Rule 83.5.3, which is submitted herewith, together with a certificate of good standing issued by the clerk of the United States District Court for the Southern District of New York.
- 5. A notice of my appearance as co-counsel for defendant Siemens is also submitted herewith.
- 6. In compliance with Local Rule 7.1, I have conferred with counsel for the plaintiff in this action, who has advised that he does not oppose this motion.

WHEREFORE, it is respectfully requested that the court grant leave to Jean L. Schmidt to appear and practice before this court, *pro hac vice*, on behalf of defendant Siemens at trial and in all pre-trial proceedings in this action.

Respectfully submitted,

Michael G. Tracy BBO No.: 501320

RUDOLPH FRIEDMANN LLP

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Dated: June 24, 2005

## CERTIFICATE OF SERVICE

I, Michael G. Tracy, hereby certify that on the 24<sup>th</sup> day of June 2005, I made service of the foregoing motion for admission *pro hac vice* by causing a copy thereof to be transmitted by first-class mail, postage prepaid, to the office of each of the following:

Robert H. Flynn, Esq. Flynn Law Firm, P.C. 27 Mica Lane Wellesley, MA 02481

Jean L. Schmidt, Esq. Brown Raysman Millstein Felder & Steiner LLP 900 Third Avenue New York, NY 10022

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